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September 28, 2004

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW – Portals
Washington, DC 20554

Re: Unbundled Access to Network Elements, WC Docket No. 04-313;
Section 251 Unbundling Obligations for Incumbent Local Exchange Carriers,
CC Docket No. 01-338

Dear Ms. Dortch:

On September 27, 2004, Ed Shakin, Sherry Ingram, Dee May, Scott Randolph and I, representing Verizon, met with Tom Navin, Ben Childers, Gail Cohen, Ian Dillner, Russell Hanser, Alex Johns, Brad Koerner, Marcus Maher, Jeremy Miller, Carol Simpson, and Tim Stelzig of the Wireline Competition Bureau.

The purpose of the meeting was to discuss Verizon's perspectives on how the Commission should approach its impairment analysis for high-capacity facilities. Verizon reviewed maps and data previously filed with the Commission on June 24, 2004, showing the presence of competitors' facilities and their use of special access services. Verizon provided a summary sheet of some of the relevant data in its previous filing. [See attachment.] In addition, Verizon explained why the ETI "study" of special access was premised on errors and misconceptions of the actual market for high capacity services. [See attachments.]

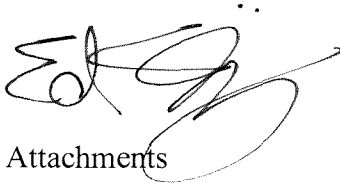
Verizon also discussed ways to evaluate impairment for DS-1 loops. Among the points raised was the concentration of competitive alternatives in high density wire centers, such as those with 5,000 or more business lines. Verizon also brought up the importance of recognizing the availability and use of special access in any evaluation of impairment for DS-1 loops in particular. Such consideration was beyond the scope of the Commission's tests for special access pricing flexibility – the last time the Commission undertook to establish a comprehensive scheme to evaluate competition for high capacity services.

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Finally, in a follow-up phone conversation on September 27, with Gail Cohen, Ian Dillner, Jeremy Miller, and Carol Simpson, Verizon explained how it had calculated its data concerning the use of special access services by competitors that had been included in the June 24 filing.

Please place this notice in the record of the above proceedings.

Sincerely,

A handwritten signature in black ink, appearing to be "BK", with a long horizontal stroke extending to the right.

Attachments

c: Tom Navin
Ben Childers
Gail Cohen
Ian Dillner
Russell Hanser
Alex Johns

Brad Koerner
Marcus Maher
Jeremy Miller
Carol Simpson
Tim Stelzig

ATTACHMENT 1

TRO FACT SHEET

Demand Concentration

- 80% of the special access demand is in less than 9% of Verizon wire centers;
- three-quarters of those wire centers are located in just 20 of Verizon's top MSAs;
- 85% of special access revenues from end user customers come from sales to large enterprise.

Competitive Deployment

- at least 1 network in 98 of the top 100 MSAs.
- an average of 20 in each of the top 50 MSAs.
- more than 180,000 route miles of fiber:
 - AT&T – 21,000 *local* route miles in 70 MSAs
 - TWT – 12,247 *local* route miles in 41 MSAs
 - XO – 23,800 total route miles in 34 MSAs
 - MCI – 9,000 *local* route miles 63 MSAs
 - Cox – 9,500 total route miles in 23 MSAs
 - TelCove – 8,700 *local* route miles in 48 MSAs
- connecting to thousands of buildings:
 - AT&T – 6,400 on net;
 - TWT – 4576 on net; 17690 served;
 - XO – 2,435 on net;
 - KMC – 1,700 on net;
 - Cox – 6,600 on net;
 - Telecove – 2,500 on net.
- to reach buildings with greatest expenditures:
 - 65% of buildings with more than \$6 million in annual telecommunications expenditures lit;
 - 57% of buildings with \$4-6 million lit;
 - 50% of buildings with \$2-4 million lit.

Competitor Use of Other Alternatives

- service is being provided using fixed wireless:
 - 40% of large business;
 - 29% of med-sized business;
 - 23% of small businesses using fixed wireless for at least some high capacity services.
- 5/4/04 WiTel using fixed wireless to expand networks in Tier 2 and 3 markets.

Competitor Use of Special Access

- 80% of Verizon's special access revenues are derived from sales to carrier customers.

Special Access v. UNE (All)

- DS1 – 93% of circuits were purchased as special access versus 7 % UNEs;
- DS3 – 98% special access versus 2% UNEs;
- DS1 combinations – 95% purchases as special access versus 5% purchases as EELs.

Special Access v. UNE (Less AT&T, MCI, Sprint)

- DS1 – 88% purchased as SA v. 12% UNEs;
- DS3 – 95% purchased as SA v. 5% UNEs;

Special Access v. UNE (Less Wireless)

- DS1 – 91% purchased as SA v. 9% UNEs;
- DS3 – 97% purchased as SA v. 3% UNEs;

Special Access v. UNE (Less AT&T, MCI, Sprint & Wireless)

- DS1 – 85% purchased as SA v. 15% UNEs;
- DS3 – 94% purchased as SA v. 6% UNEs;

Special Access Pricing Statistics

- Customers buy under volume & term discounts. For example, carriers buy special access at rates that are 35-40% off monthly rates;
- \$403 = average of monthly tariff rates;
- \$247 = actual average customers pay per DS-1;
- \$168 = actual average rate customer pay for UNE DS-1 circuit.

ATTACHMENT 2

THE ETI REPORT DISTORTS MARKET FACTS ON HIGH CAPACITY COMPETITION

ETI argues there is no competition in the market for high capacity services and that as a result, ILECs have raised prices for special access services, resulting in harm to end user customers. ETI is wrong for two reasons.

- First, as described below, there is extensive competition to provide end user customers high capacity services both from competitors who have deployed their own facilities to serve these customers as well as from competitors who are using exclusively ILEC special access services or a combination of their own facilities and ILEC special access services.
- Second, because of this extensive market competition, the prices both carrier and end user customers are actually paying for special access services have actually declined.

ETI argues CLECs are dependent upon ILEC special access for “last mile” (local loop) connections to enterprise customers because CLECs have deployed their own facilities to only 1% of ETI’s estimated 3-million commercial buildings in the United States. The truth is:

There Is Extensive Competition to Provide End User Customers High Capacity Services.

- Demand for high capacity facilities is highly concentrated in downtown business districts.
 - 80% of the special access demand is in just 8.5% of Verizon’s wire centers.
 - Three-fourths of those wire centers are located in just Verizon’s top 20 MSAs.
 - ETI distorts the percentage served by including thousands of small buildings that are not served by *any* high capacity facilities because there is no demand there.
- Competing providers have deployed high capacity facilities to meet that demand:
 - There is at least 1 competitive network in 98 of the top 100 MSAs in the country;
 - There is an average of 20 competitive networks in each of the top 50 MSAs.
- Competing providers have deployed 180,000 route miles of fiber including:
 - AT&T – 21,000 *local* route miles in 70 MSAs;
 - Time Warner – 21,247 local route miles in 41 MSAs;
 - XO – 23,800 total route miles in 34 MSAs;
 - MCI – 9,000 *local* route miles in 63 MSAs;
 - Cox – 9,500 total route miles in 23 MSAs;
 - TelCove – 8,700 *local* route miles in 48 MSAs.
- Competing providers, in fact, have connected to thousands of buildings including:

- AT&T – 6,400 on net;	KMC – 1,700 on net;
- Time Warner – 4,576 on net; 17,690 served;	Cox – 6,600 on net;
- XO – 2,434 on net;	TelCove – 2,500 on net.

- CLECS themselves, including AT&T, boast about the extensive reach of their networks:
 - Time Warner earns the “majority of [its] revenue ... exclusively through [its] own network facilities ...” and boasts that “[w]hile [RBOCs] have lots of fiber deployed, I don’t know that they have more buildings connected than we do in all cases.”
 - AT&T tells investors that its own network “touches virtually all Fortune 1,000 Companies,” and that its core network extends “all the way to the customer premises;”
 - Level 3 states that its “metro networks comprise almost one million miles of installed optical fiber and connect to 792 on-net buildings.”
- Demand for high capacity services is so concentrated that competitors have deployed their own facilities in markets that represent 80% of Verizon’s high capacity services.
 - Data Verizon purchased from GeoTel and physical inspections confirm that there are competing providers with their own fiber in each of Verizon’s top 20 MSAs.
 - Data purchased from GeoResults confirm that competing providers have extended the reach of the fiber networks to thousands of buildings in Verizon’s top 20 MSAs.
- ETI relies on maps created by Verizon that show the success of CLECs using special access, but fails to acknowledge maps from the same filing that demonstrate that other CLECs are using non-Verizon facilities to serve customers in the same locations.
 - Attachment 1 shows competitive fiber and lit buildings in the New York MSA.
 - Attachment 2 shows that competitors have deployed facilities and equipment to many of the same locations that other CLECs are serving using special access services.
- ETI also denies the scope of inter-modal competition from fixed wireless and cable.
 - Analysts report that 40% of large business (5,000+ employees) use fixed wireless or cable service for at least some high-capacity service. (In-Stat/MDR, Dec. 2003).
- Finally, independent analysts confirm that ETI has its basic facts wrong:
 - ETI ignores the fact that large carriers purchased major providers of high cap services:

“The large carriers made multi-billion dollar acquisitions (i.e. Teleport, MFS, Brooks Fiber) to improve their reach in local markets to improve their cost structures and lower their dependence on the Bells. As a result, we believe that roughly 25% of AT&T’s customer connections are on-net – utilizing their own facilities to reach customers. We believe this figure is between 10-20% for MCI. When these carriers are required to use off-net facilities they try to use third party connectivity (CLECS, utilities) when available to avoid Bell special access. These figures contrast with the white paper that suggested that the Bells control 98% of the special access market – a figure we believe is much too high.” (UBS, “Telecom Wake-Up Call”).
 - Royce Holland: “The large ... enterprise market ... is all but irrelevant in the debate over competition policy because there are no bottleneck facilities.” (TR Daily 12/03).

Despite this overwhelming evidence, ETI argues there is a lack of competitive alternatives based on the “fact,” according to ETI, that ILECs have raised prices for special access services. ETI makes its claim based on the monthly (“sticker price”) rates in ILEC tariffs. The truth is:

Prices competing providers actually pay for special access services have declined *because of the availability of competitive alternatives in the high capacity market.*

- Customers do not pay the monthly tariffed rates, but instead actually buy special access services at deep discounts of 25 to 40 percent off those monthly rates.
 - Attachment 3 shows the difference between the *monthly* tariffed rates for a DS-1 circuit (\$403) and the average price per DS-1 circuit customers are actually paying (\$254).
- Prices Verizon customers are actually paying for DS-1 special access circuits have declined by 9% since 2001, and the overall decrease in prices actually paid for all special access services was even higher.
- As Attachment 4 shows, even the ARMIS data relied on by ETI confirms that the average price per special access line sold by the RBOCs has fallen during the period of pricing flexibility, and that the price charged by Verizon has fallen even faster.
- This extensive competition in the market for high capacity services has changed dramatically the way both our wholesale and retail customers do business with us.
 - Some wholesale customers who have deployed or purchased facilities deeper into our network are migrating off Verizon’s special access facilities onto their own facilities.
 - Others that are more aggressive make it clear that they prefer to build themselves and will do so unless Verizon provides more cost effective prices for the facilities they need.
 - Even customers who have not deployed their own facilities but instead rely almost exclusively on special access to compete report they have lots of other alternatives and threaten to take their business elsewhere if Verizon does not offer competitive prices.
 - As a result, retail customers receive bids for high capacity services from multiple vendors and, therefore, demand competitive pricing when purchasing these services.
- Verizon has responded to this competition and to customer-specific requests for price reductions both through volume and term discounts mentioned above and through contract tariffs offered in areas where we have pricing flexibility for high capacity services.
 - To encourage competing providers to continue to purchase entrance facility services from us, in May, Verizon offered an additional 8% off the already discounted 5-year term rates to customers who agreed to purchase a certain number of SONET¹ services.
 - To encourage competing providers to keep their high capacity transport services with us, Verizon previously offered additional discounts of between 15-21% off 5-year term rates to customers who renewed their already existing SONET services.
 - Verizon also filed contract tariffs, including more than 5 New Connect Plans, offering customers additional discounts of between 10%-20% off already low term rates when they order new SONET, DS-3s, DS-1s and Facility Management Services.

¹ SONET (Synchronous Optical Network) services allow customers to transport DS-1s, DS-3s, OCn, and now Ethernet services.

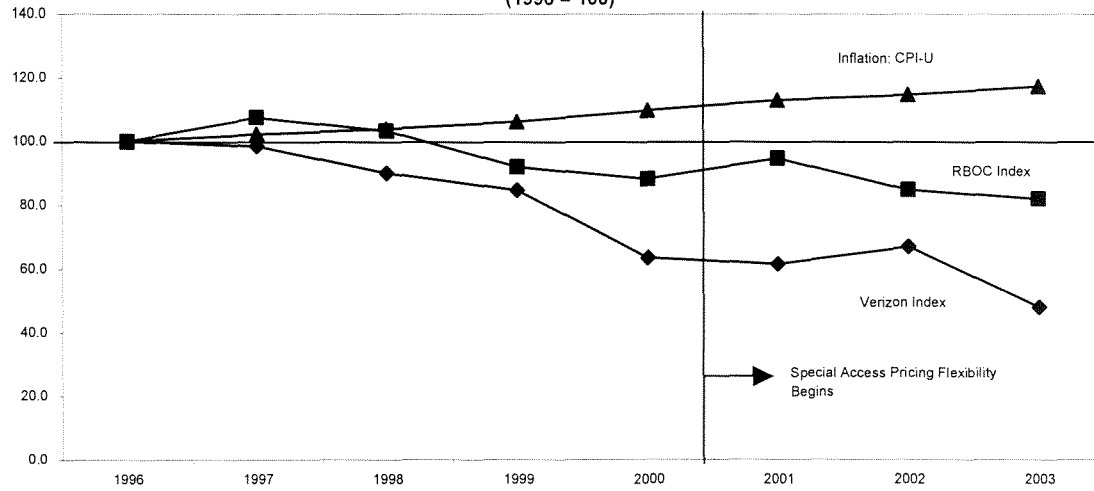
- While Verizon has lost some retail accounts because it did not have pricing flexibility for services the customer required and, therefore, could not match an un-regulated competitor's price, many retail customers have qualified for price flex offerings.
 - * One customer took advantage of an offer that provided a discount of nearly 25% off the 5-year term plan rates for DS-3 circuits and 16% off those rates for DS-1s.
 - * Another took advantage of an offer that provided 20% off new SONET rings (using the New Connect Plans), and 13% off our 5-year term rates for DS-1 services.
 - * One government agency took advantage of an offer that provided 20% off OC-192 IDSR rings and 30% off IOTS services, both high capacity transport services.
- Through volume and term discounts and these contract tariff offerings one carrier customer, which relies exclusively on special access services to serve enterprise customers, has achieved a 21% reduction in prices per circuit in just the last 18 months.

Relying on data from the FCC's ARMIS reports, ETI argues ILEC abuse of their market power is evident by their excessive rates of return. The truth is:

- The FCC has recognized that the category-specific data computations from ARMIS reports
 - are not reliable indicators of market power and “do[] not serve a ratemaking purpose.”
 - has referred to the cost-allocation rules as “outdated regulatory mechanisms that are out of step with today's rapidly-evolving telecommunications marketplace”; and
 - has indicated that reducing “regulatory reliance on earnings calculations based on accounting data is essential to the transition to a competitive marketplace.”
- The problem of mismatches is particularly acute with respect to special access because the rules assign the growing *revenues* associated with DSL services and interstate packet-switched services to the special-access element, but assign a significant portion of the associated interstate *costs* to other elements.
- AT&T's own experts agree:
 - “Because [a carrier's] services use[] the same network, computers[,] and other facilities whatever the jurisdiction, determining the cost basis for calculating an economically meaningful rate of return is impossible.”
 - AT&T experts have acknowledged that, “fully allocated cost figures and the corresponding rate of return numbers simply have zero economic content” and “cannot pretend to constitute approximations to anything.”

ATTACHMENT 3

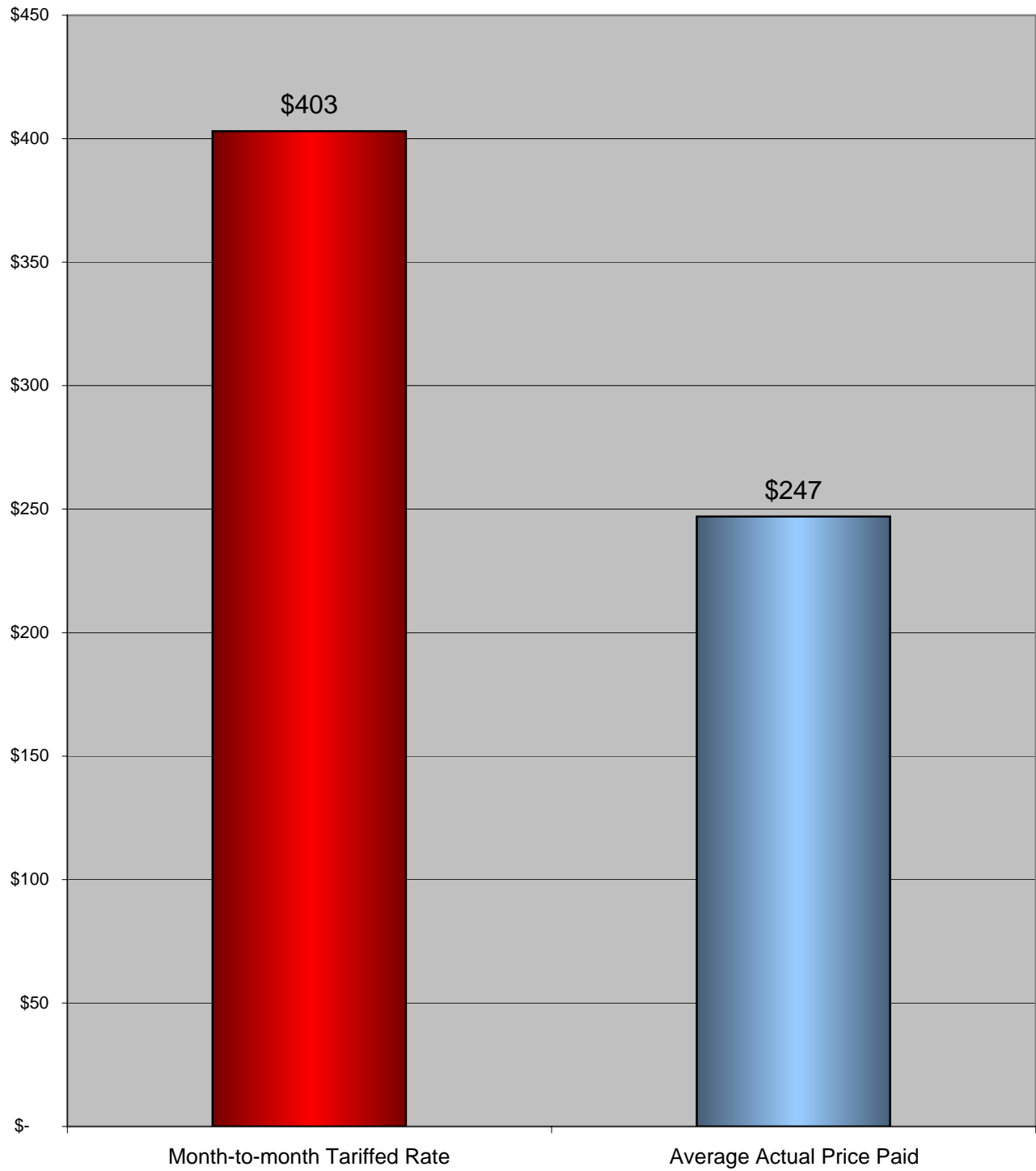
Nominal Special Access Revenue per
Special Access Voice Grade Equivalent
(1996 = 100)



Source: FCC ARMIS Report 43-08, 43-03, BLS

ATTACHMENT 4

DS1: Tariffed Rate v. Average Actual Price Paid
(as of April 2004)



ATTACHMENT 5

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total
Accountants	104
Advertising & Marketing	952
Aerospace Manufacturer	6
Aerospace Research & Development	58
Aerospace Technology	9
Agricultural Products	8
Air Cargo & Package Express Services	7
Air Conditioning Contractors	10
Aircraft Flight Training Equipment	11
Aircraft Manufacturers	56
Aircraft Parts & Equipment	11
Airports	159
Alarm Systems & Security Services	404
Alcohol & Drug Abuse Rehabilitation Services	18
Ambulance Services	6
Antique Dealers	2
Antique Reproductions Retailers	7
Apartment Complexes	3
Appliance Service & Repair	1
Appraisal Service	4
Arcades & Amusements	32
Architectural Services	32
Armed Forces	782
Armed Forces - Air Force	2
Armed Forces - Air Force Base	263
Armed Forces - Army	194
Armed Forces - Coast Guard	3
Armed Forces - National Guard	4
Armed Forces - Navy	26
Art Collection	3
Art Supplies Retailers	4
Arts & Entertainment	130
Arts & Entertainment - Cinemas & Theatres	59
Arts & Entertainment - Music	40
Associations and Interest Groups	725
Auctioneers	23
Audiovisual Equipment Manufacturers	9
Audiovisual/Computer Rental & Leasing	6
Autioneers	3
Auto Clubs	2
Auto Dealers	1796
Auto Manufacturers	131
Auto Rentals	844
Automated Teller Machines	2
Automation Consultants	2
Automation Equipment & Systems Dealers	15
Automotive - Auction	5
Automotive - Parts, Supplies, Service	1019

Category and Number of Circuits	Total
Automotive - Truck Sales, Service	43
Aviation	66
Aviation Services	113
Bail Bonds	3
Bank Equipment & Supplies	12
Bar Code Scanning Equipment & Supplies	2
Barrels & Drums	7
Bearings Wholesale & Manufacturers	3
Beauty Salon Equipment & Supplies Retail	5
Beverages Wholesale & Manufacturers	4
Biomedical Research	1
Biotechnology	117
Boat Manufacturers	4
Book & Music Stores	180
Books & Music Retailers	392
Builders & Contractors	233
Builders & Contractors - Commercial & Industrial	171
Builders & Contractors - Home Construction	65
Building Inspection & Pest Control Services	56
Building Materials & Supplies Dealers	113
Building Materials & Supplies Dealers - Fiberglass	8
Building Remodeling & Repair Contractors	9
Business & Professional Services	1230
Business Consultants & Advisors	2
Business Services - Distribution	245
Cable Manufacturers	3
Call Centers & Answering Services	51
Cameras & Camera Supplies	13
Camping & Backpacking Equipment & Supplies Dealers	1
Canners & Food Processors	10
Cargo Container Manufacturers	12
Catalog Shopping	6
Catering	4
CDs Tapes & Records Retail	2
Cell Phone Equipment & Supplies	51
Cement & Sand & Gravel Manufacturers	22
Certified & Registered Massage Therapists	2
Charitable & Nonprofit Organizations	1
Chauffeured Services	18
Chemical Manufacturers	362
Chemicals Manufacturers	133
Child Care	29
Chimney Cleaning Services	3
Churches & Religious Organizations	329
Civil Engineering Firm	8

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Civil Engineers	24	Contractors	
Cleaning Services	9	Construction & Contractors - Roofing	3
Clinical Services - Social & Human Services	12	Construction Engineers	5
Clothing & Accessories (Designer) Retailers	28	Construction Equipment & Supplies	15
Clothing & Accessories Manufacturers	182	Construction Equipment & Vehicle Rental	3
Clothing & Accessories Retailers	736	Construction Management Services	114
Cocoa Processors	1	Consulting Services - General	1195
Cold Storage Warehouses	4	Consumer Goods Manufacturers	776
Collection Services	8	Consumer Goods Retailers	136
Communications - Video Conferencing	21	Consumer Groups	5
Commodity & Merchandise Warehouses	31	Contractors' Equipment & Supplies Dealers	20
Common & Face Brick Dealers	2	Convenience Stores	83
Communications	1469	Conveyor Belting & Belting Supplies Dealers	3
Communications - Broadcasting	201	Copying, Printing & Graphics Services	610
Communications - Cable	280	Corporate Housing	6
Communications - Cable & Satellite	96	Corrugated & Fiber Boxes Retail	51
Communications - Cellular	105	Cosmetics	116
Communications - Internet Hosting	34	Cosmetics Retailers	31
Communications - ISP	18	Courier Services	12
Communications - Major Media	53	Crafts Stores	23
Communications - Radio	70	Credit & Debt Counseling Services	25
Communications - Satellite & Cable	3	Credit Collection & Reporting Agency	109
Communications - Telecom	5538	Cryogenics Equipment & Supplies	2
Communications - Television	163	Currency Exchange Services	5
Communications - Verizon	1815	Customs Brokers & Consultants	31
Communications - Wireless	2307	Data Communications Equipment & Systems	13
Communications & Public Relations	9	Dating & Introduction Services	1
Communications & Public Relations		Defense Contractors	591
Consultants	11	Department Store	47
Communications Equipment & Supplies	3	Department Stores	1800
Computer & Equipment Dealers	18	Design and Engineering	48
Computer Networking Installation	4	Discount Variety Stores	90
Computer Peripherals - Printers, Laser Printers	9	Document Management Services	138
Computer Supplies Parts & Accessories	13	Dog & Horse Racing	16
Computer Systems Consultants & Designers	272	Door & Window Dealers	8
Computer Testing Services	13	Drug Stores & Pharmacies	887
Computers	891	Dry Cleaners	22
Computers - Equipment & Supplies	70	Education - Admin, Boards, Associations	123
Computers - Equipment Repair & Maintenance	156	Education - Colleges & Universities	1958
Computers & Equipment Repair	9	Education - Commercial Services	178
Computing Solutions	4	Education - K-12 Schools	686
Concrete & Concrete Products Dealers	16	Education - Professional Training/Devel	325
Concrete Contractors	4	Electric Contractors	34
Conference Call Services	14	Electric Equipment & Supplies Dealers	71
Conference Facilities & Convention Centers	11	Electric Motor Dealers	30
Construction & Contractors - Doors & Windows	6	Electrolysis Treatments, Lasers	2
Construction & Contractors - Floors & Flooring	33	Electronic Equipment	5
Construction & Contractors - General	46	Electronic Equipment & Supplies Retail	20

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Electronic Instruments Retail	112	Supplies	
Electronic Research Design & Development	2	Fish & Wildlife	3
Electronic Testing Equipment Dealers	27	Flavoring Extracts	14
Electronics & Appliance Manufacturers	43	Florists	46
Electronics & Appliance Parts & Supplies	41	Flour Mill	1
Electronics & Appliances Manufacturers	203	Food & Beverage Producers and Distributors	1515
Electronics and Appliance Retailers	773	Food & Beverage Providers and Distributors	44
Electronics Manufacturers	906	Food & Beverage Retailers	75
Electronics Wholesale Distributor	35	Food Preservation Equipment & Supplies	12
Elevator Equipment & Services	63	Food Processing Equipment & Supplies	11
Employment Agencies	803	Footwear Stores	20
Employment Agencies - Temp Staffing	113	Forklift & Industrial Truck Dealers	4
Engineers	5	Fragrance & Cosmetics Stores	3
Entertainment	154	Funeral/Memorial Services	49
Entertainment - Movie Studio	28	Furniture	47
Envelopes Manufacturers & Wholesalers	6	Furniture Stores	195
Environmental & Ecological Consultants	66	Garage Doors & Openers	9
Environmental Association	22	Gas Stations	14
Environmental Engineers	26	General Merchandise Wholesale	36
Environmental Services	26	Genetic Research	1
Equipment Manufacturers	2	Genetics Research	16
Executive Suites	68	Geographic Information Services	13
Fabrics Stores	14	Gift/Houseware Retailers	213
Family & General Practice Physicians & Surgeons	11	Glass Wholesale & Manufacturers	22
Fast Food Stores	15	Global Marketing, Communications, & Entertainment	12
Fasteners Wholesale & Manufacturers	8	Global Positioning System	5
Feed Fertilizer & Power Equipment	1	Government	24
Fiber Optic Equipment Systems & Supplies	6	Government - Accounting	5
Fiberglass & Materials	5	Government - Civil Defense - Power Authority	35
Financial - Advisor Services	34	Government - Correctional Facility	90
Financial - Advisory Services	930	Government - Courthouse	56
Financial - Banks	12125	Government - Courts	115
Financial - Credit Card Companies	307	Government - Customs	3
Financial - Credit Unions	462	Government - Embassy/Consulate	89
Financial - Electronic Payment Svcs	145	Government - FBI	121
Financial - General Services	5485	Government - Federal	3585
Financial - Investment Services	5906	Government - Federal - Aviation	103
Financial - Loan Service	73	Government - Federal - Communications	48
Financial - Loan Services	307	Government - Federal - Courts	13
Financial - Mortgage Companies	1846	Government - Federal - Defense	564
Financial - Mutual Services	109	Government - Federal - Defense - Imagery & Mapping	1
Financial - Research Services	10	Government - Federal - Food & Drug Admin	3
Finger Printing Services & Equipment	11	Government - Federal - Geological Surveys	8
Fire Alarms, Extinguishers & Sprinklers	28	Government - Federal - Health & Human Services	127
Fire Departments	8	Government - Federal - House of	28
Fire Fighters Associations	3		
Fireproofing & Firestopping Materials &	2		

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Representatives		Healthcare - General	3466
Government - Federal - Housing & Urban Development	3	Healthcare - Home (Nursing, Convalescent, Rehab)	40
Government - Federal - Info Systems	35	Healthcare - Homes (Nursing, Convalescent, Rehab)	473
Government - Federal - Labor Relations	3	Healthcare - Hospitals	1500
Government - Federal - Postal Services	13	Healthcare - Physicians & Surgeons	6
Government - Federal - Senate	16	Healthcare - Radiology	56
Government - Federal - Treasury	36	Healthcare - Research, Labs	356
Government - Foreign	13	Healthcare - Vision	85
Government - Foreign - Consulate	2	Heating & Refrigeration Equipment	
Government - Foreign - Embassy	13	Manufacturers	109
Government - General Services Administration	93	Heating & Ventilating Contractors	24
Government - Immigration & Customs	9	Heavy Equipment Manufacturers	18
Government - Local	464	Home Décor Retailers	161
Government - Local - Law Enforcement	42	Home Improvement Retailers	209
Government - Local - Taxes & Finance	16	Home Improvement Services	1
Government - Local - Transportation	138	Home Improvement Stores	537
Government - National Parks & Conservation Land	7	Home Improvement, Repair, Lawns Services	114
Government - Naval Shipyard	6	Home Products - Siding	19
Government - Police/Sherriff	23	Hospice	12
Government - Printing	16	Hospital Consultants & Management	1
Government - State	706	Hospital Equipment & Supplies Retail	87
Government - State - Lottery	31	Hospitality	33
Government - State - Sentate	48	Hospitality Services	17
Government - State - State Senate	66	Hotel & Motel Equipment & Supplies	4
Government - Telecommunications	12	Hotel Reservations Service Provider	7
Government - Training	3	Hotel Services	2
Government - US Congress Representatives	1	Hotels & Lodging	3857
Government - Weather Service	17	Household Linens & Furnishing Retailers	119
Government Contractors - Computer Networks	3	Housing Authority	3
Government Contractors - Computer Systems	4	Human Resource Business Services	180
Government Insurance Carriers	1	Imaging Equipment Manufacturers	17
Greenhouses and Nurseries	6	Incinerators Parts & Services	6
Grocery Stores & Supermarkets	2964	Industrial Equipment & Supplies	33
Gypsum & Gypsum Products	31	Industrial Equipment & Supplies Dealers	60
Hair Dressers	5	Industrial Equipment Rental & Leasing	3
Hair Restoration	2	Industrial Parks Management	55
Hardware Stores	31	Industry - Aerospace	81
Health & Beauty Products Manufacturers	53	Industry - Metals	47
Health & Diet Foods Stores	44	Industry - Mining/Natural Resources	6
Health & Human Services - Leukemia	3	Industry - Paper	255
Health Agencies	2	Industry - Power, Fuel, Water, Energy	1736
Health Clubs & Gyms	11	Industry - Trade Association	146
Health Maintenance Organizations	57	Information Services	454
Healthcare	1355	Information Technology & Automation	4
Healthcare - Clinics & Medical Centers	457	Ink Manufacturers' Materials	8
Healthcare - Dental	133	Instruments & Equipment Manufacturers	111

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Insurance	7444	Medical Advisors/Consultants	4
Insurance - Claims Processing Service & Adjusters	2	Medical Analysis	3
Insurance - Health Care Services	139	Medical Answering Services	4
Insurance - Life Insurance	17	Medical Association	1
Insurance - Title Insurance	98	Medical Billing & Collections Services	13
Insurance - Workers' Compensation Services	16	Medical Centers - Blood Center	6
Interest Groups and Associations	12	Medical Consulting	31
Interior Design	4	Medical Device Manufacturers	19
Internet Services	1037	Medical Equipment	2
Investigation Services	16	Medical Exam Board	1
IT Consulting & Business Services	1919	Medical Information Technology	16
Jewelry Importers	3	Medical Laboratory	8
Jewelry Stores	104	Medical Laboratory - Radiology	1
Journalism/News Service	145	Medical Products and Services	356
Journalism/News Services	27	Medical Research	39
Kitchen & Bath Distributor	27	Medical Services	81
Labor Relations	1	Medical Specialties	46
Labor Unions	21	Medical Specialties - Behavioral Health	18
Laboratories	501	Medical Specialties - Cancer Foundation	1
Laboratory Equipment & Supplies	1	Medical Specialties - Cancer Treatment Centers	2
Landscape Designers & Consultants	28	Medical Specialties - Cardiovascular	2
Landscape Equipment & Supplies Dealers	74	Medical Specialties - Cardiovascular Health	16
Landscaping	5	Medical Specialties - Cerebral Palsy	15
Laundry Service	7	Medical Specialties - Counseling	1
Law Firms & Legal Services	1047	Medical Specialties - Endoscopy	1
Lawn & Garden Equipment & Supplies	6	Medical Specialties - Eye Surgery Center	1
Leather Goods Manufacturers	3	Medical Specialties - Home Care	6
Leather Goods Retailers	63	Medical Specialties - MRI	25
Libraries	126	Medical Specialties - Muscular Dystrophy	12
Lighting Fixtures Manufacturers	8	Medical Specialties - OB-GYN	6
Lighting Fixtures Retailers	47	Medical Specialties - Optometry	2
Linen Supply Services & Uniforms Retail	26	Medical Specialties - Orthopedics	38
Lithographers	68	Medical Specialties - Radiology	14
Lumber	41	Medical Specialties - Ultrasounds	28
Mail Order & Catalog Sales	4	Medical Staffing Services	1
Malls & Shopping Centers	91	Medical Supplies	5
Management Consulting	478	Medical Transcription	4
Manufacturers - General	1394	Merchandising	5
Manufacturers' Agents & Representatives	28	Merchandising Services & Systems	9
Materials & Packaging Manufacturers	341	Metal Products	53
Mechanical Contracting	13	Metal Stamping Equipment & Supplies	8
Mechanical Contractors & Engineers	1	Microfilming & Imaging Service	
Mechanical Equipment & Supplies	4	Equipment/Supplies	8
Media & Communications - Sales Presentations	3	Miscellaneous	53403
Medical	4	Mobile Offices & Commercial Units	5
Medical - Blood Bank	5	Modeling Agency	1
Medical & Dental X-Ray Laboratories	3	Modular & Mobile Home & Buildings Dealers	3
		Money Orders & Transfer Services	5

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total	Category and Number of Circuits	Total
Mortgages	205	Plumbing Supplies	28
Motion Picture Distributors	20	Pneumatic Equipment & Suppliers Dealers	10
Moving & Storage	103	Pneumatic Tools & Equipment	6
Museums	72	Polyethylene Materials & Products	23
Music Publishing/Supply	27	Postal Services	2
Musical Instrument - Rental and Sales	34	Product Packaging Labeling & Shipping	34
Newspaper Publishers	381	Production Studio	17
Non-Profit Organizations	334	Property Management	4
NULL NAME	61222	Public Housing	1
Office Furniture & Equipment Dealers	44	Publishers	779
Office Machinery & Supplies	2	Radio Phone Equipment & Systems	24
Office Management Services	71	Real Estate - Agencies	1235
Office Space and Support Services	94	Real Estate - Commercial & Industrial	159
Office Supplies Stores	730	Real Estate - Commerical & Industrial	21
Office Supplies Wholesale & Manufacturers	10	Real Estate - Corporate Housing	17
Office Supply Stores	27	Real Estate - Developers & Subdividers	89
Online Services	66	Recreational Vehicles	6
Organ Donation & Tissue Banks	6	Recruiting Services	1
Outdoor Advertising & Billboards	2	Recycling/Conservation Services	24
Outsourcing - Business Management	117	Rentals - Furniture	5
Packaging	7	Rentals - General	99
Packaging & Shipping Services	710	Rentals and Sales - Heavy Equipment	48
Paint & Paint Products	2	Research	358
Paint Manufacturers	20	Resorts	7
Painting & Paint Supplies	7	Restaurant Management & Consultants	2
Paper Products	1	Restaurant Services	2
Parking	11	Restaurants	371
Parking & Traffic Consultants	4	Retail - Pet Supplies	1
Parks & Recreation	25	Retailers - General	3
Party Supplies Stores	29	Retirement Communities & Homes	49
Payroll & Payment Services	233	Road & Highway Construction Machinery & Equipment	8
Payroll Services	10	Robotics	2
Perfumes & Colognes Raw Materials & Supplies	4	Sales Training	2
Pest Control Services	63	Salons & Spas	7
Pharmaceuticals	1651	Salvage Services	7
Phone Equipment & Systems Dealers	1	Sand & Gravel Dealers & Recycling Centers	18
Photographic Equipment & Supplies	28	Saw Sales Sharpening & Repair	3
Photographic Equipment & Supplies Retail	4	Science	46
Photography Stores	5	Science - Forensics	2
Photography Studios & Picture Libraries	3	Science - Health	8
Physical Therapy	1	Science - Research	35
Physical Therapy Equipment and Supplies	7	Science & Technology	3
Pipe Fabrication	1	Science and Engineering	279
Plastic Products	92	Scientific Instruments & Supplies Dealers	87
Plastic Raw Materials	1	Scooters & Powered Chairs	7
Plumbing & Heating Supplies	128	Semiconductors	27
Plumbing Services	3	Sewing Machines	1

Business Types Served by
Sample CLECs Using Verizon Special Access

Category and Number of Circuits	Total
Shipbuilding	13
Sign Dealers, Display Designers & Producers	8
Social & Human Services Organization	108
Social & Human Services Organizations	11
Social Clubs	2
Social Groups	25
Soda Fountain Equipment & Supplies	10
Software & CD ROM Sales & Services	6
Sound Equipment & Systems Sales Rental & Leasing	3
Space & Navigation	5
Space Communications	5
Space Exploration & Defense	7
Specialty Stores	162
Spices Wholesale & Manufacturers	1
Sporting Goods Retailers	189
Sports	3
Sports - Athletic/Fitness Clubs	229
Sports - Auto Clubs	20
Sports - Baseball	5
Sports - Basketball	32
Sports - Beach Club	1
Sports - Boxing	3
Sports - Clubs/Facilities	24
Sports - Equestrian	1
Sports - Football	15
Sports - Golf/Country Clubs	43
Sports - Hockey	3
Sports - Soccer	3
Sports - Yacht Clubs	4
Sports & Recreation	15
Sports & Recreation - Off-Track Betting	13
Sports & Recreation - Paint Ball	2
Sports & Recreation - Youth & Family Centers	15
Steam Boiler	5
Steamship Companies	4
Steel Manufacturers	77
Stock Exchanges	89
Swimming Pools Manufacturers & Installation	2
Systems & Integration Engineers	1
Tax Return Preparation	147
Taxi Cab Services	2
Technology - Computer Networks	28
Technology - Data	265
Technology - Engineering	187
Technology - General	856

Category and Number of Circuits	Total
Technology - Network	993
Technology - R&D	142
Technology - Software	1112
Technology & Engineering	1142
Technology Research and Development	840
Telecommunications Management	1
Telecommunications Wiring & Cabling	13
Telemarketing	12
Terminal & Container Services	5
Testing Equipment & Supplies Wholesale & Manufacturers	4
Textile & Fabric Manufacturers	97
Title Company	38
Title Insurance/Escrow Services	80
Tobacco & Tobacco Products	19
Tools	5
Tools Wholesale & Manufacturers	2
Tourist Attractions	9
Toy Manufacturers	40
Toy Stores	230
Traffic & Transportation Engineers	9
Translators & Interpreters	2
Transportation	261
Transportation - Airlines	546
Transportation - Bus	33
Transportation - Rail	248
Transportation - Shipping	79
Transportation - Trucking/Freight	766
Travel Agencies & Tourism	835
Vehicle Licensing Service	2
Veterans	3
Veterinary Services	43
Video Production Services	2
Wallpaper Wholesale & Manufacturers	12
Warehouses	30
Waste Management	156
Water Filtration & Purification Equipment	
Retail	18
Waterworks Equipment & Supplies	3
Wire & Wire Products	2
Wireless Phone Stores	71
Wood Products	21
Wrecking & Demolition Contractors	8
Youth Organizations Centers & Clubs	6
Grand Total	248670